

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC.; ELSEVIER, INC.;  
MCGRAW-HILL GLOBAL EDUCATION  
HOLDINGS, LLC; and CENGAGE LEARNING,  
INC.,

Plaintiffs,

v.

IMRAN AWAN; AMRO T. AWWAD; RONG LI;  
ANITA RAIN RANI; VIJAY KUMAR; AMMAR  
ABDULWAHID MAZRUI; MICHAEL PAO  
(A/K/A MATTHEW WATSON); NIDIA  
ESPINOZA; MANISH KUMAR SINGH (A/K/A  
“MAX DEN” and “SHYAM”); ROSCHELLE T.  
SALMON; and YAROSLAV IAKOVIN,

Defendants.

**Civil Action No. 18-cv-402-DLC**

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR AMRO AWWAD**

Pursuant to Local Civil Rule 1.4 of the United States District Court for the Southern District of New York, Attorney for Defendant Amro Awwad, Daliah Saper, respectfully requests that this Court grant her motion to withdraw as counsel for Defendant Amro Awwad (“Defendant”). In support of this motion, the undersigned attorney states as follows:

1. Ms. Saper, of Saper Law Offices, LLC, was retained on May 10, 2018, by Defendant for representation in the above-captioned matter.

2. Since being retained, Ms. Saper has been granted admission to appear *pro hac vice* before this Court and has filed a short Motion for Extension of Time to answer the Amended Complaint.

3. Although Defendant only recently retained Ms. Saper, both Defendant and Ms. Saper mutually agree that Ms. Saper should withdraw from representing him in the above-

captioned case at this time.

4. Defendant is already in the process of engaging substitute representation.

5. Defendant was only served in this matter on May 3, 2018, and his answer or other response to the Amended Complaint is due on June 21, 2018. In addition, no trial date has been set and no discovery schedule has been entered into with respect to Defendant.

6. Therefore, granting this motion will not prejudice any party or cause any undue delay.

7. Ms. Saper will not be asserting a retaining or charging lien.

8. Ms. Saper reached out to Plaintiff's counsel on June 13, 2018 and apprised them that she would be filing this motion.

9. A copy of this motion has also been sent to Defendant via electronic mail, which has been Ms. Saper's most common method of written communication with him.

WHEREFORE, Daliah Saper respectfully requests that this Court grant the foregoing motion.

Respectfully submitted,

Dated: June 15, 2018

/s/ Daliah Saper  
Daliah Saper  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 15, 2018 the foregoing **MOTION FOR LEAVE TO WITHDRAW AS COUNSEL** was filed with the Clerk of Court for the Southern District of New York using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ Daliah Saper  
Daliah Saper